This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

_____ Date 2/15/2005

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites –18 and –38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely,

Daryl F. Koch
FFA/CO Manager

DK/jc

cc: Nicholas Ceto, U.S. EPA Region 10, Richland, WA
Dennis Faulk, U.S. EPA Region 10, Richland, WA
Kathy Ivy, U.S. EPA Region 10, Seattle, WA
Mark Shaw, DOE, Idaho Falls
Margie English, DEQ, Boise, ID

DOE/ID-10870
April 2002

Site 040 Track 1 Decision Documentation Package, OU 10-08

DECISION DOCUMENTATION PACKAGE
COVER SHEET

Prepared in accordance with

TRACK 1 SITES:
GUIDANCE FOR ASSESSING
LOW PROBABILITY HAZARD SITES
AT THE INEEL

Site Description: Mound Southeast of EOCR Buildings

Site ID: 040 **Operable Unit:** 10-08

Waste Area Group: 10

I. SUMMARY – Physical description of the site:

Approximately 2.5 miles east of the Central Facilities Area at the INEEL, Site #040 is a soil and gravel mound about 20 ft in diameter and 4 ft high, that is just south of Arthur Boulevard, the access road leading to the former Experimental Organic Cooled Reactor (EOCR)/Security Training Facility (STF) and Organic Moderated Reactor Experiment (OMRE).

The OMRE was a test reactor that operated between 1957 and 1963, which was decontaminated and decommissioned in 1978. The EOCR project was cancelled in the 1960s before the reactor was complete, reusable materials were taken out of the building, and it was abandoned. Between 1983 and 1990, the area was used for security force maneuvers and for INEEL security helicopter and Special Response Team training. The complex was decontaminated and decommissioned in 1999.

The soil and gravel mound was originally observed as part of an environmental baseline assessment in 1994 and was identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, *Reporting or Disturbance of Suspected Inactive Waste Sites*, a new site identification form was completed for this site. As part of the process, a field team wrote a site description, and collected photographs and global positioning system (GPS) coordinates for the site _____. The GPS coordinate system was listed as NAD 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

The 1994 environmental baseline assessment reported that the mound consisted of dirt, gravel, and concrete debris, with a metal fence post extending approximately one ft above the top surface of the mound. There was no evidence of debris within the mound. The site investigation reported that the mound was sparsely vegetated with bunch grass. Concrete chunks bordered one end of the mound. There was no visual evidence of stained soil or odor. The origin of the mound is unknown, but it is suspected to have originated from construction or decontamination and decommission activities at EOCR/STF. No historical data has been found to explain the purpose of the metal stake. No field screening or sampling data is available for Site 040.

DECISION RECOMMENDATION

II. SUMMARY - Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site that poses a risk to human health and the environment , nor is there empirical, circumstantial, or other evidence of contaminant migration. However, interviews with ER ES&H personnel, environmental baseline assessment team members, and Cultural Resources personnel revealed no historical process knowledge of this site, so the reliability of information in this report is medium to low.

The new site investigation and photographs reveal no visual evidence of hazardous substances that present a danger to human health or the environment; however, because of the lack of field screening or sample data, the overall qualitative risk is unknown.

III. SUMMARY - Consequences of Error:

False negative error:
It is unknown if contamination exists or if levels exceed risk-based limits. However, neither historical process knowledge nor limited field investigations and visual observations of the mound showed evidence of contamination.

False positive error:
If further action were completed at this site, funds expended could potentially exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides, and other hazardous constituents would be needed to verify the presence or absence of contamination.

IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that Site 040 be classified as no further action. Although field investigations and historical process knowledge are limited, a review of available information reveals that no current or potential threat can be found; therefore, the pathway is incomplete. In addition, Site 040 lacks visual evidence of contamination, the vegetation appears healthy, and the only debris present is a small volume of broken concrete.

Signatures: 9/30/04	# Pages: 17	Date: February 27, 2001
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:	
Approved By: 9-30-04	Independent Review: 9-28-04	

DECISION STATEMENT (DOE RPM)	
Date Received: 1/14/05	
Disposition: Site 040 2.5 miles east of CFA is classified as no action. This determination will be recorded in the site database and listed in the 2005 INEEL Integrated 5-Year Review.	
Date: 1/14/05	# Pages:
Name: Kathleen Hain	Signature: Kathleen E Hain

DECISION STATEMENT (EPA RPM)	site-040
Date Received:	

Disposition:

EPA concurs this site should be classified as no-Action.

Date: 9-23-04	# Pages:
Name: Dennis Faulk	Signature:

DECISION STATEMENT
(IDEQ RPM)

Date Received: May 8, 2002

Disposition:

Site 040

Site 040 is a soil and gravel mound located about 2.5 miles east of the CFA. The mound is about 20 feet in diameter and 4 feet high. The 1994 environmental baseline assessment reported the mound includes dirt, gravel, concrete debris, and a metal fence post extends from the top of the mound. The mound is believed to have resulted from the construction or decontamination and decommissioning activities at EOCR/STF. The mound is sparsely vegetated, concrete chunks border one end of the mound, and there is no evidence of stained soil or odor. No field screening or other data are available for this site.

The State recommends this site for No Further Action.

Date: August 6, 2004	**# Pages:**
Name: Daryl F. Koch	**Signature:** Daryl F. Koch

PROCESS/WASTE WORKSHEET **PROCESS:** Mound Southeast of EOCR Buildings

SITE ID: 040 **WASTE:** Soil/gravel/concrete chunks

Col 1 Processes Associated With This Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Soil/gravel mound containing concrete chunks.	Debris, possibly resulting from construction activity.	**Artifact:** Mound **Location:** Southeast of EOCR; just south of paved access road (Arthur Blvd.); 2.5 miles east of CFA **Description:** Soil/gravel mound containing concrete chunks. Approximately 20 ft in diameter, 4 ft height Sparsely vegetated with bunch grass. Metal fence stake extends approximately one foot from top of mound.

CONTAMINANT WORKSHEET

PROCESS: Mound Southeast of EOCR Buildings

SITE ID: 040 **WASTE:** Soil/gravel/concrete chunks

Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (hi/med/low)	Col 9 Overall Reliability (high/med/low)
None	Soil	None	Unknown	Med	Med

Question 1. What are the waste generation processes, locations, and dates of operation associated with this site?

Block 1 Answer:

Site 040 consists of a soil/gravel mound approximately 20 ft in diameter and 4 ft in height. Concrete chunks border one end of the mound and a metal fence stake extends upwards approximately one ft from center of mound. The mound is located just south of the paved access road to the former EOCR/STF. The EOCR/STF complex served as a training center for the INEEL security helicopters and Special Response Team, and was used for security force maneuvers until placed on inactive status in 1990. The site was decontaminated and decommissioned in 1999. The origin of the mound is unknown, but it may be from EOCR construction or OMRE decontamination and decommissioning activities.

Block 2 How reliable are the information sources? _High X Med _Low (check one)
Explain the reasoning behind this evaluation.

Interviews with INEEL Environmental Restoration Environment Safety and Health (ER ES&H) personnel, environmental baseline assessment team members, and Cultural Resources personnel revealed no historical process knowledge of the mound.

Block 3 Has this INFORMATION been confirmed? X Yes _No (check one)
If so, describe the confirmation.

Photographs of the site and a 1999 site investigation confirmed location, size, and physical description of this site.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	[X]	**Analytical data**	[ ]
Anecdotal	[X] 2,5	**Documentation about data**	[ ]
Historical process data	[ ]	**Disposal data**	[ ]
Current process data	[ ]	**Q.A. data**	[ ]
Photographs	[X] 3	**Safety analysis report**	[ ]
Engineering/site drawings	[ ]	**D&D report**	[ ]
Unusual Occurrence Report	[ ]	**Initial assessment**	[X] 4
Summary documents	[ ]	**Well data**	[ ]
Facility SOPs	[ ]	**Construction data**	[ ]
OTHER	[ ]		

Question 2. What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?

Block 1 Answer:

Site 040 consists of a soil/gravel mound approximately 20 ft in circumference and 4 ft in height. Concrete chunks border one end of the mound and a metal fence stake extends approximately one ft upwards from center of mound. The mound is located just south of the paved access road to the former EOCR/STF site. The origin of the mound is unknown, but it may have come from EOCR construction or OMRE decontamination and decommissioning activities. The purpose of the metal stake is unknown.

Block 2 How reliable are the information sources? _High X Med X Low (check one)
Explain the reasoning behind this evaluation.

Interviews with ER ES&H personnel, environmental baseline assessment team members, and Cultural Resources personnel revealed no historical process knowledge of this site.

Block 3 Has this INFORMATION been confirmed? _Yes X No (check one)
If so, describe the confirmation.

Photographs of the site and a 1999 site investigation confirmed location, size, and physical description only of this site.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	[X]	**Analytical data**	[ ]
Anecdotal	[X] 2,5	**Documentation about data**	[ ]
Historical process data	[ ]	**Disposal data**	[ ]
Current process data	[ ]	**Q.A. data**	[ ]
Photographs	[X] 3	**Safety analysis report**	[ ]
Engineering/site drawings	[ ]	**D&D report**	[ ]
Unusual Occurrence Report	[ ]	**Initial assessment**	[X] 4
Summary documents	[ ]	**Well data**	[ ]
Facility SOPs	[ ]	**Construction data**	[ ]
OTHER	[ ]		

Question 3. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.

Block 1 Answer:

There is no evidence that a source exists at this site.

Very little information is available for this site. The site investigation and photographs reveal that the mound is sparsely vegetated with bunch grass. There is no visual evidence of stained soil or odor. The site team determined that the mound consisted of dirt, gravel, and concrete debris, possibly originating from construction activities. The purpose of the metal stake is unknown. There was no visual evidence of debris within the mound. Field screening or soil sampling would be required to confirm the presence of a source at this site.

Block 2 How reliable are the information sources?_High X Med X Low (check one)
Explain the reasoning behind this evaluation.

Interviews with ER ES&H personnel, environmental baseline assessment team members, and Cultural Resources personnel revealed no historical process knowledge of this site.

Block 3 Has this information been confirmed?_Yes X No (check one)
If so, describe the confirmation.

Photographs of the site and a 1999 site investigation confirmed location, size, and physical description only of this site.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	[X]	**Analytical data**	[ ]
Anecdotal	[X] 2,5	**Documentation about data**	[ ]
Historical process data	[ ]	**Disposal data**	[ ]
Current process data	[ ]	**Q.A. data**	[ ]
Photographs	[X] 3	**Safety analysis report**	[ ]
Engineering/site drawings	[ ]	**D&D report**	[ ]
Unusual Occurrence Report	[ ]	**Initial assessment**	[X] 4
Summary documents	[X] 1	**Well data**	[ ]
Facility SOPs	[ ]	**Construction data**	[ ]
OTHER	[ ]		

Question 4. Is there empirical, circumstantial, or other evidence of migration? If so, what is it?

Block 1 Answer:

There is no evidence of migration at this site.

Site investigations have revealed no evidence of stained or discolored soil. The crested wheatgrass bunches on the mound appear healthy, but are not as close together as the bunches on the surrounding soil, possibly because there is less topsoil on the mound. No historical data has been found to explain the purpose of the metal stake. The potential for contaminant migration cannot be estimated without field screening or sampling.

Block 2 How reliable are the information sources? _ High X Med X Low (check one)
Explain the reasoning behind this evaluation.

Interviews with ER ES&H personnel, environmental baseline assessment team members, and Cultural Resources personnel revealed no historical process knowledge of this site.

Block 3 Has this information been confirmed? _Yes X No (check one)
If so, describe the confirmation.

A site inspection and recent photographs of the mound reveal no visual evidence of migration; however, it cannot be confirmed without field screening or sampling.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	**[X]**	**Analytical data**	**[ ]**
Anecdotal	**[X] 2,5**	**Documentation about data**	**[ ]**
Historical process data	**[ ]**	**Disposal data**	**[ ]**
Current process data	**[ ]**	**Q.A. data**	**[ ]**
Photographs	**[X] 3**	**Safety analysis report**	**[ ]**
Engineering/site drawings	**[ ]**	**D&D report**	**[ ]**
Unusual Occurrence Report	**[ ]**	**Initial assessment**	**[X] 4**
Summary documents	**[X] 1**	**Well data**	**[ ]**
Facility SOPs	**[ ]**	**Construction data**	**[ ]**
OTHER	**[ ]**		

Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?

Block 1 Answer:

There is no expected pattern of potential contamination from this site; however, the mound is approximately 20 ft in diameter and 4 ft high and there is no visual evidence of contamination.

The pattern of potential contamination cannot be estimated without field screening or sampling.

Block 2 How reliable are the information sources? _High X Med X Low (check one) Explain the reasoning behind this evaluation.

Interviews with ER ES&H personnel, environmental baseline assessment team members, and Cultural Resources personnel revealed no historical process knowledge of this site.

Block 3 Has this information been confirmed? _Yes X No (check one)
If so, describe the confirmation.

A site inspection and recent photographs of the mound reveal no visual evidence of potential contamination; however, its absence cannot be estimated or confirmed without field screening or sampling.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	[X]	**Analytical data**	[ ]
Anecdotal	[X] 2,5	**Documentation about data**	[ ]
Historical process data	[ ]	**Disposal data**	[ ]
Current process data	[ ]	**Q.A. data**	[ ]
Photographs	[X] 3	**Safety analysis report**	[ ]
Engineering/site drawings	[ ]	**D&D report**	[ ]
Unusual Occurrence Report	[ ]	**Initial assessment**	[X] 4
Summary documents	[X] 1	**Well data**	[ ]
Facility SOPs	[ ]	**Construction data**	[ ]
OTHER	[ ]		

Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.

Block 1 Answer:

The new site investigation reported that the site included a mound about 20 ft in diameter and 4 ft in height.

There is insufficient information to estimate a source or contaminated region. The volume of contamination, if any, cannot be estimated without field screening or sampling.

Block 2 How reliable are the information sources? _High _X_Med _X_Low (check one)
Explain the reasoning behind this evaluation.

The volume of contamination, if any, cannot be estimated without field screening or sampling.

Block 3 Has this INFORMATION been confirmed? __Yes _X_ No (check one)
If so, describe the confirmation.

Other hazardous constituents cannot be confirmed with existing information.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	[X]	**Analytical data**	[ ]
Anecdotal	[ ]	**Documentation about data**	[ ]
Historical process data	[ ]	**Disposal data**	[ ]
Current process data	[ ]	**Q.A. data**	[ ]
Photographs	[X] 3	**Safety analysis report**	[ ]
Engineering/site drawings	[ ]	**D&D report**	[ ]
Unusual Occurrence Report	[ ]	**Initial assessment**	[X] 4
Summary documents	[X] 1	**Well data**	[ ]
Facility SOPs	[ ]	**Construction data**	[ ]
OTHER	[ ]		

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.

Block 1 Answer:

The quantity of hazardous substances/constituents at this site cannot be estimated without field screening or sampling.

Block 2 How reliable are the information sources? _High X Med X Low (check one)
Explain the reasoning behind this evaluation.

This evaluation is based on the 1999 site investigation and photographs. Historical process knowledge of the site is not available.

Block 3 Has this INFORMATION been confirmed? _Yes X No (check one)
If so, describe the confirmation.

The quantity of hazardous constituents cannot be estimated or confirmed with existing information.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	[X]	**Analytical data**	[ ]
Anecdotal	[ ]	**Documentation about data**	[ ]
Historical process data	[ ]	**Disposal data**	[ ]
Current process data	[ ]	**Q.A. data**	[ ]
Photographs	[X] 3	**Safety analysis report**	[ ]
Engineering/site drawings	[ ]	**D&D report**	[ ]
Unusual Occurrence Report	[ ]	**Initial assessment**	[X] 4
Summary documents	[ ]	**Well data**	[ ]
Facility SOPs	[ ]	**Construction data**	[ ]
OTHER	[ ]		

Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.

Block 1 Answer:

There is no evidence that a hazardous substance or constituent is present at levels that require action at this site, but no historical process information is available for this site. No field screening or sampling has been conducted at this site to confirm the presence or absence of a hazardous substance or constituent. No soil staining or odors are present. The crested wheatgrass bunches on the mound appear healthy, but are not as close together as the bunches on the surrounding soil, possibly because there is less topsoil on the mound. No historical data has been found to explain the purpose of the metal stake.

Block 2 How reliable are the information sources? _High X Med _X Low (check one)
Explain the reasoning behind this evaluation.

This evaluation is based on interviews with ER ES&H personnel, environmental baseline assessment team members, and Cultural Resource Management.

Block 3 Has this INFORMATION been confirmed? Yes _X No (check one)
If so, describe the confirmation.

The evidence cannot be confirmed with existing information.

Block 4 Sources of Information [check appropriate box(es) & source number from reference list]

No available information	**[X]**	**Analytical data**	**[ ]**
Anecdotal	**[ ]**	**Documentation about data**	**[ ]**
Historical process data	**[X] 2,5**	**Disposal data**	**[ ]**
Current process data	**[ ]**	**Q.A. data**	**[ ]**
Photographs	**[X] 3**	**Safety analysis report**	**[ ]**
Engineering/site drawings	**[ ]**	**D&D report**	**[ ]**
Unusual Occurrence Report	**[ ]**	**Initial assessment**	**[X] 4**
Summary documents	**[X] 1**	**Well data**	**[ ]**
Facility SOPs	**[ ]**	**Construction data**	**[ ]**
OTHER	**[ ]**		

REFERENCES

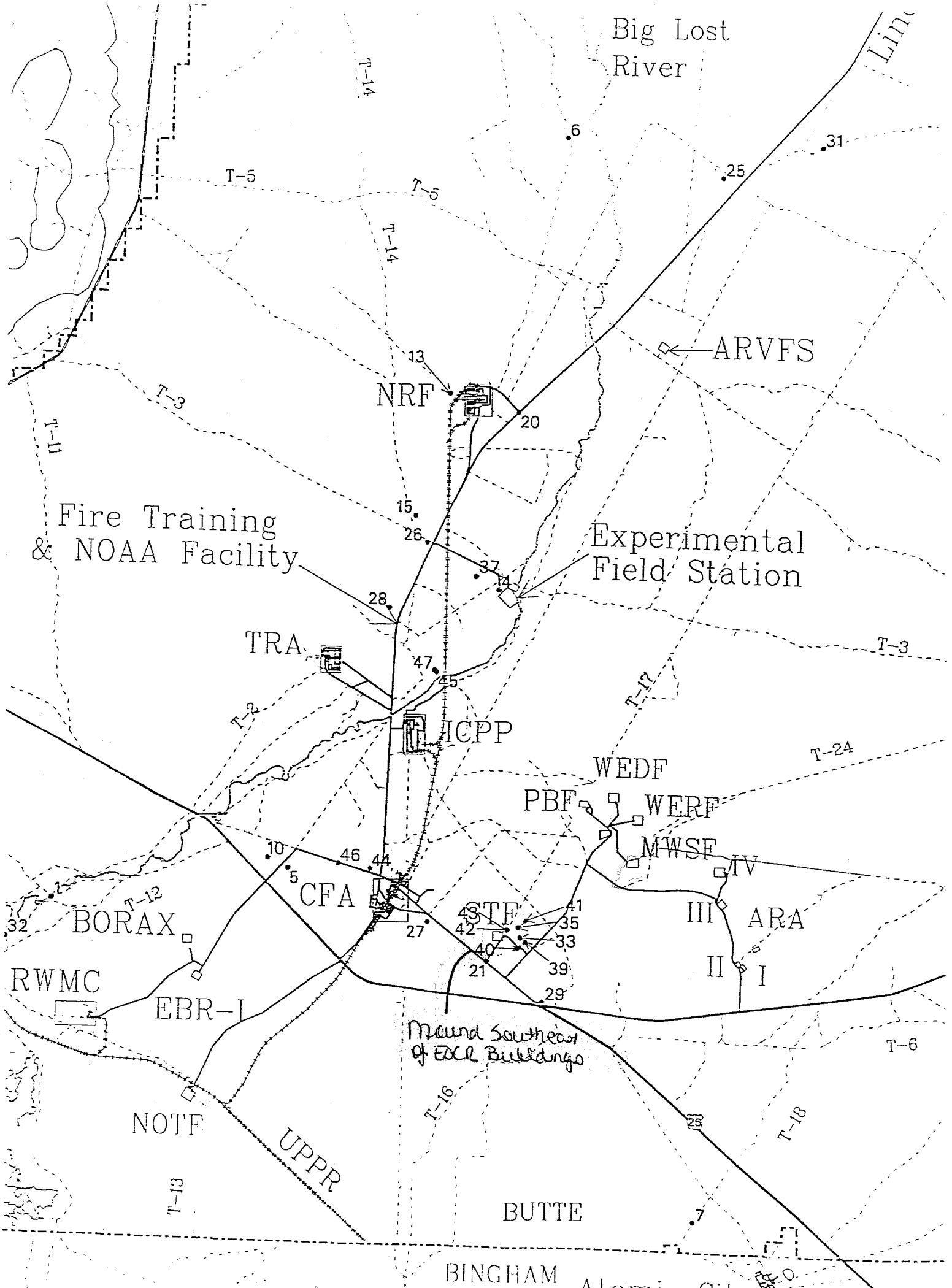
1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.

2. Interviews with Scott Lebow, Environmental Baseline Assessment team member, and Robert Montgomery ER ES&H, EG&G Idaho, Inc. re: July 1994, February 2001.

3. Photographs of Site #0: PN94-, PN94-, PN94-, and PN99-.

4. FY1999 WAG 10 Newly Identified Sites, Volumes I. and II.

5. Interview with Brenda Ringe Pace, INEEL Cultural Resources Management, February 2001


Big Lost River
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ARVFS
Fire Training
& NOAA Facility
Experimental
Field Station
TRA
ICPP
WEDF
PBF
WERF
MWSF
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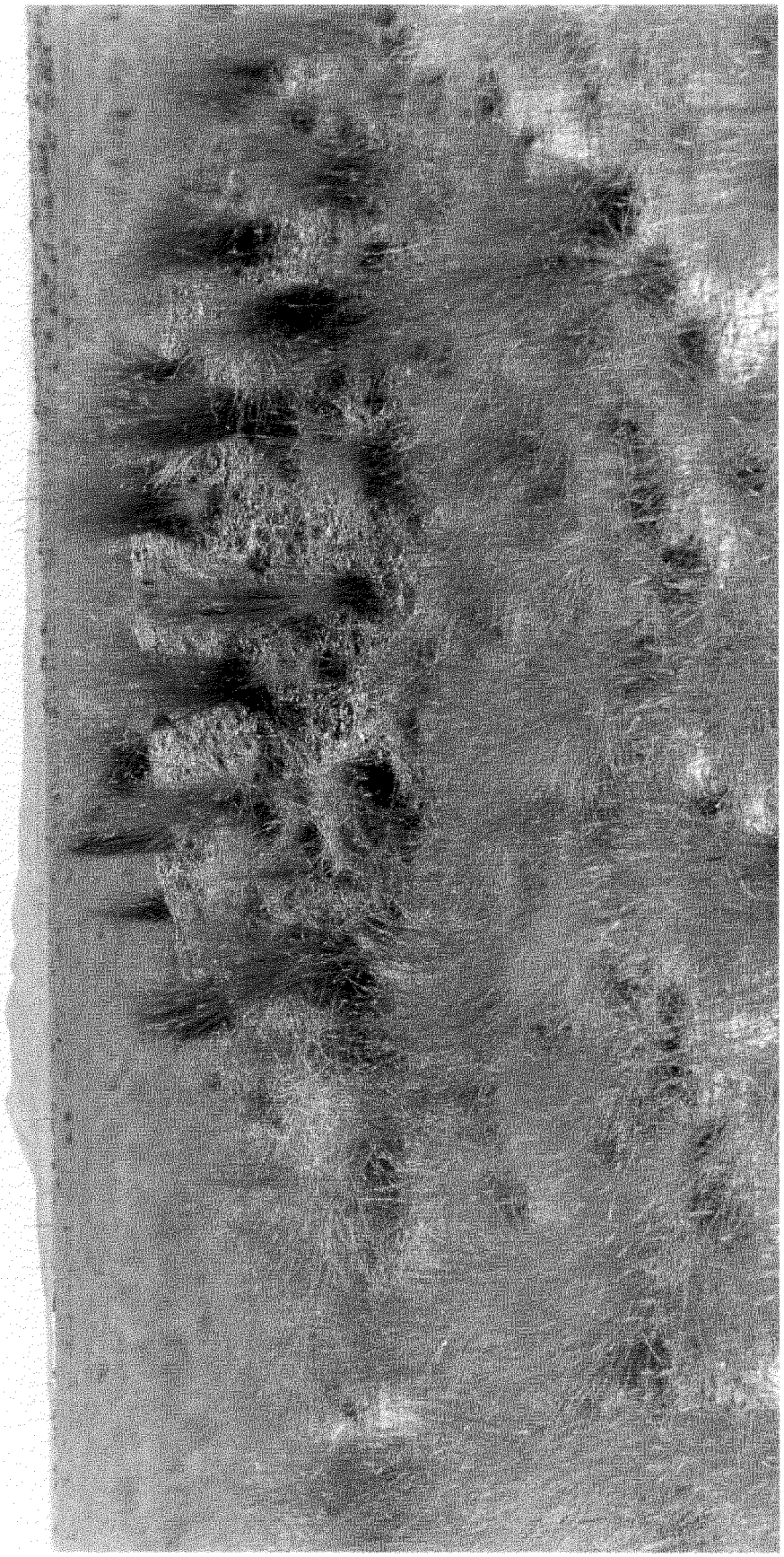
I
CFA
STF
BORAX
RWMC
EBR-I
NOTF
UPPR
Mound Southeast
of ECR Buildings
BUTTE
BINGHAM

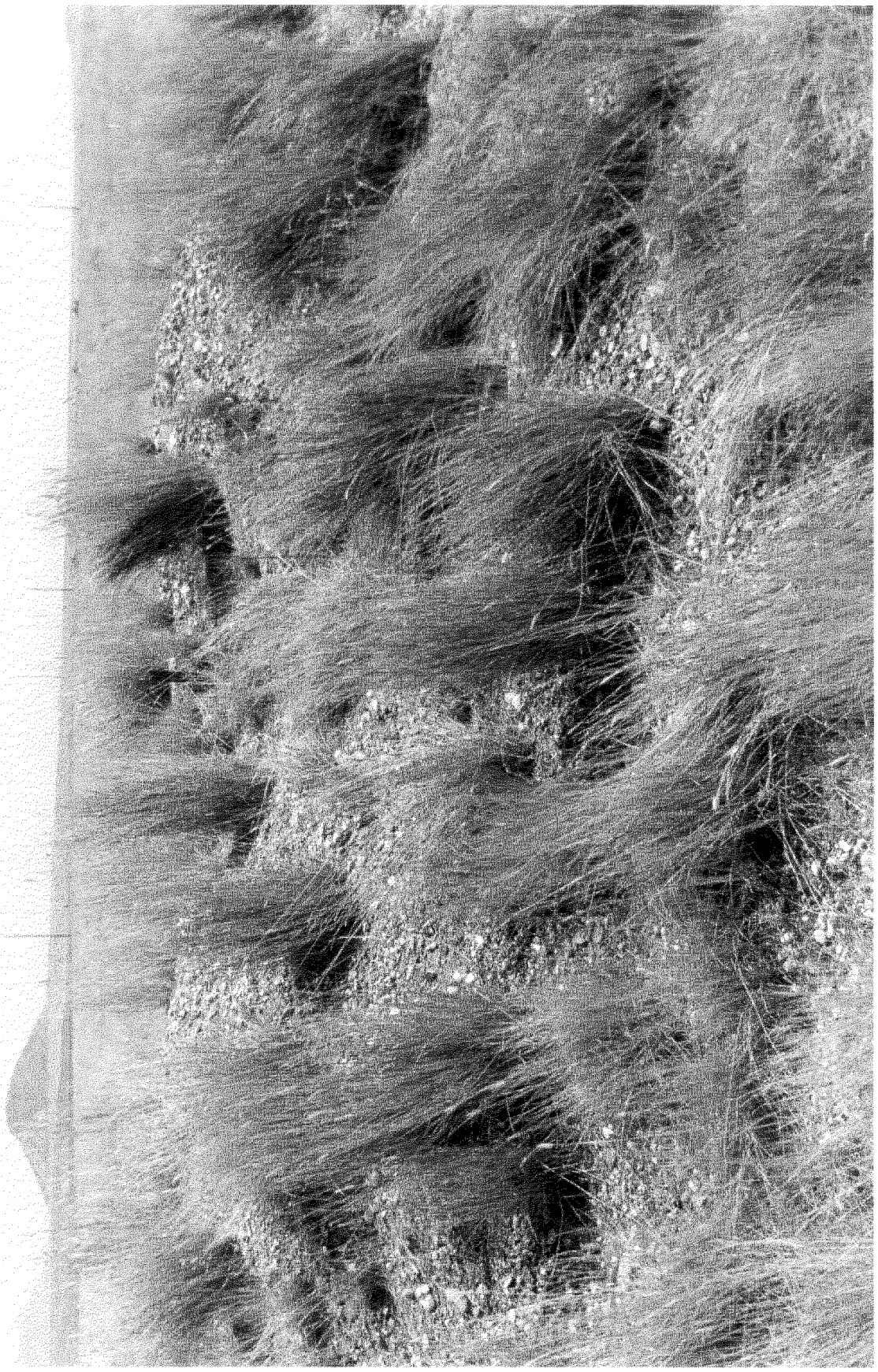
Draft

Attachment A

Photographs of Site #040



Mound Southeast of EOCR Buildings (PN99-0494-1-17)



Mound Southeast of EOCR Buildings (PN99-0494-1-18)

Draft

Attachment B

Supporting Information for Site #040

(4)

435.36
04/14/99
Rev. 03

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer	
1. Person Initiating Report: Jacob Harris	Phone: 526-1877
Contractor WAG Manager: Douglas Burns	Phone: 526-4324
2. Site Title: 040, Mound Southeast of EOCR Buildings	

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

The site is located just south of the paved access road to the EOCR/STF buildings. During the August 1999 site visit, observations included a mound about 20 feet in diameter and 4 feet high. This mound has a metal fence post in the top with only about one foot protruding above the dirt. Surrounding one end of the mound is concrete on the ground. The GPS coordinates of the site are _____. The reference number for this site is 040 and can be found on the summary map as provided.

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.
WAG: Operable Unit:

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.

5. Basis for the recommendation:

The conditions that exist at this site indicate the potential for an inactive waste site according to Section 2 of MCP-3448 Reporting or Disturbance of Suspected Inactive Waste Sites.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: _____ Signature: _____ Date: _____

Interview with Brenda Ringe Pace, 526-0916
Marilyn Paarmann and Cary Richardson, WPI
February 7, 2001

We met with Brenda Ringe Pace of the INEEL Cultural Resources Management Division on February 7, 2001. We discussed WAG 10 sites, 004, 008, 010, 025, 026, 028, 034, 035, 040 and 045. Brenda informed us that several of the sites (i.e., 008, 010, 026, 028) contain early twentieth century homestead artifacts and met the requirements of cultural resources. It would be necessary to complete an intensive cultural resource pedestrian inventory prior to any clean up or sampling activities at these sites. "Dumps more than 50 years of age must be formally recorded and any actions to clean them up or disturb in any way must undergo review by State Historic Preservation Office SHPO, under Section 106 of the National Historical Preservation Act. This involves field recording, photographs, SHPO consultations, mapping, report writing, and filing with state. Purpose is to evaluate cultural properties prior to cleanup activities for preliminary assessment of the potential impact of trash removal to avoid adverse effects."

Her concern with the other six sites includes, but is not limited to, completing an environmental checklist if disturbance to the area surrounding the sites is possible and inventory of any historical artifacts present. Site 008 had two unidentified metal pipes, which during the interview were identified by Gale Health of the Geosciences Division, as well drilling bits. Gale mentioned that these bits are still available in most farming/hardware stores. Brenda suggested that we contact Hans Clayton when dealing with sites containing ordnance- related materials.

On March 3, 1995, Brenda visited the canal to assess age and integrity, document the resource, determine if cleanup of loose asbestos sheets would impact the resource, and collect necessary information for initial consultation with SHPO for eventual cleanup of area. This site is regarded as "a historical resource" and any subsequent activity would require SHPO and Cultural Resource involvement.

Brenda stated that she personally observed the removal of asbestos containing materials (wallboard and ceiling tile scraps) at Site 010. She said the bottom layer of debris in the canal was left by homesteaders and canal builders. Upper layer is part of historical period (1940-1970) that falls under SHPO; debris from first INEEL landfill (U.S. Navy and their families living at what is known as CFA. Industrial debris is from a later period, but no later than 1970 and likely relates to INEEL activities.

The canal is one of the INEEL Cultural Resources tour sites.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: **Site 040 Track 1 Decision Documentation Package, OU 10-08: Mound Southeast of EOCR Buildings (DOE/ID 10870)**

DATE: April 3, 2002 **REVIEWER:** IDEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
COMMENTS				
1		Page 8, block 3	The statement uses the term "confirmed" but the "No" category is checked. Is this a conditional confirmation like those on pages 9 and 10 or something else? Please check.	Comment incorporated. This should be a "yes."